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8 Attorneys for Defendant
9 FIA CARD SERVICES

10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12
13 TATIANA OLmos, individually and
on behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 FIA CARD SERVICES, N.A., a
17 national bank,

18 Defendant.

19 Case No. 15-cv-2786 BAS BGS

**JOINT MOTION FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

Judge: Hon. Cynthia Bashant
Ctrm: 4B

20 Pursuant to Local Rule 12.1 of the Local Rules of Practice for the United
21 States District Court for the Southern District of California, Plaintiff Tatiana Olmos
22 (“Plaintiff”) and Defendant FIA Card Services, N.A. (“Defendant”) hereby move
23 and request that Defendant be granted an extension of time until February 8, 2016,
24 to answer or to otherwise respond to Plaintiff’s Complaint.

25 The extension of time is supported by good cause. The Complaint was filed
26 on December 10, 2015. Defendant was served with the Complaint on December
27 14, 2015, and its response to the Complaint is currently due on January 4, 2016.
28 The requested extension will provide Defendant additional time to investigate

1 plaintiff's allegations and prepare a response to the Complaint. This is the first
2 request for an extension of time for Defendant to respond to the Complaint.

3 Therefore, the parties respectfully request that the Court enter an Order
4 extending the time for Defendant to respond to the Complaint until February 8,
5 2016.

6 **ECF ATTESTATION**

7 I, Jessica Roberts, am the ECF user whose ID and password are being used to
8 file this Joint Motion for Extension of Time to Respond to Complaint. I hereby
9 attest that Benjamin H. Richman has concurred in this filing.

10

11 Dated: December 30, 2015 MORRISON & FOERSTER LLP

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13

By: /s/ Jessica Roberts
JESSICA ROBERTS
JRoberts@mofo.com

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Attorneys for Defendant
FIA CARD SERVICES

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Dated: December 30, 2015 EDELSON PC

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By: /s/ Benjamin H. Richman
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Attorneys for Plaintiff
TATIANA OLmos

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CERTIFICATE OF SERVICE

I certify that on December 30, 2015, I caused a copy of the foregoing to be filed electronically and that the document is available for viewing and downloading from the ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

By: /s/ Jessica Roberts
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